

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

IN RE: ROBERT BRAXTON DODD, { CHAPTER 13  
{  
{  
DEBTOR { CASE NO. R23-40219-PWB  
{  
{ JUDGE BONAPFEL

**SUPPLEMENTAL OBJECTION TO CONFIRMATION**

COMES NOW K. EDWARD SAFIR, CHAPTER 13 TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The proposed zero percent (0%) plan provides for the funding of a Maverick X3 Side-by-Side, a secured debt that may be excessive and unnecessary for the support of Debtor or Debtor(s) dependents, thereby indicating a lack of good faith, in violation of 11 U.S.C. Section 1325(a)(3).
2. The Chapter 13 Plan provides contradictory information regarding the interest rate for the claim of Coosa Valley Credit Union for the 2019 Maverick X3, preventing the Trustee from properly administering this plan.
3. The Chapter 13 petition and schedules fail to disclose a stock account, in violation of 11 U.S.C. § 521 and Fed. R. Bankr. P 1007(b).
4. The Debtor's Chapter 13 plan, schedules, and/or Statement of Financial Affairs are inaccurate and/or incomplete; the Trustee is unable to determine either the duration or feasibility of the proposed plan. 11 U.S.C. §§ 1325(a)(3) and 1325(a)(7). Specifically, Statement of Financial Affairs question two (2) omits the dates of prior address.

K. Edward Safir, Chapter 13 Trustee  
285 Peachtree Center Ave, NE  
Suite 1600  
Atlanta, GA 30303  
(404) 525-1110  
[eds@atlch13tt.com](mailto:eds@atlch13tt.com)

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of this Debtor's Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

/s/  
K. Edward Safir, Attorney  
Chapter 13 Trustee  
GA Bar No. 622149

K. Edward Safir, Chapter 13 Trustee  
285 Peachtree Center Ave, NE  
Suite 1600  
Atlanta, GA 30303  
(404) 525-1110  
[eds@atlch13tt.com](mailto:eds@atlch13tt.com)

R23-40219-PWB

**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the foregoing pleading using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

BERRY & ASSOCIATES

I further certify that on this day I caused a copy of this document to be served via first-class United States mail, postage prepaid, on the following parties at the address shown for each:

ROBERT BRAXTON DODD  
159 OLD ESOM HILL LOOP  
CEDARTOWN, GA 30125

This 28th day of May, 2024

/s/  
K. Edward Safir, Attorney  
Chapter 13 Trustee  
GA Bar No. 622149

K. Edward Safir, Chapter 13 Trustee  
285 Peachtree Center Ave, NE  
Suite 1600  
Atlanta, GA 30303  
(404) 525-1110  
[eds@atlch13tt.com](mailto:eds@atlch13tt.com)